

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA,)
vs.)
JEFFREY ALEXANDER STERLING,)
Defendant.)
Case No. 1:10-cr-00485-LMB

MOTION TO SEAL

COMES NOW Jeffrey A. Sterling, and for his Motion to Seal the email dated October 14, 2011, and the letter dated the same date, states as follows:

1. The defendant submits that the email and letter dated October 14, 2011, should be part of the record in this case. The Government agrees but has asked that this correspondence be filed under seal.

2. The Government has informed counsel that the basis for sealing is that the letters deal with security files for certain individuals and that such information must be filed under seal.

3. The defendant desires to have a complete record and has agreed to make this filing under seal at this time so that the record can be complete. Otherwise, the defendant does not agree that this filing should be sealed.

4. The two documents at issue have been delivered to the Court and filed under seal while the Court considers this request.

WHEREFORE, the defendant requests that the Court seal this filing initially so that it can be filed. The defendant objects to the filing remaining sealed.

JEFFREY A. STERLING
By Counsel

By: /s/
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CERTIFICATE OF SERVICE

I hereby certify that on the 28th day of November, 2011, I electronically filed the foregoing *Motion to Seal* with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to all counsel of record

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